

## **REMARKS**

### **I. Office Action Summary**

Claims 1-43 are pending, (of which claims 1, 16, 20, 23, 27, 31 and 39 are independent). In the Office Action mailed August 17, 2006, the Examiner rejected claims 1-35 and 37-43 under 35 U.S.C. 103(a). After careful review of the cited references, Applicants request favorable reconsideration in view of the following remarks.

### **II. Examiner Interview**

Applicants thank the Examiner for the telephonic interview held on February 12, 2007. During the interview, Applicants discussed the pending 103 claim rejections based on the Bickmore and Hinrose references.

In particular, Applicants asserted that the references cited did not teach “a folder can be expanded to display information content, and wherein unexpanded folder titles are displayed along with the information content of the expanded folder,” as in claim 20, “removing nodes that do not affect the visual display of the information content on the device and that do not represent the information content to be displayed on the device,” as in claim 27, and “storing information relating to the data into a plurality of arrays . . . wherein the plurality of arrays contain values associated with the nodes of the data, and wherein operations on the nodes can be carried out by utilizing the value as referenced to the affected nodes,” as in claim 31. After now understanding the difference between claims 20, 27, and 30 and the cited references, the Examiner asked Applicants to resubmit arguments discussing distinguishing factors between the present claims and the references.

### **III. Response to Rejection of Claims under 35 U.S.C. 103(a)**

Claims 1-43 were rejected under 35 U.S.C. 103(a) as being unpatentable over by Bickmore et al. “Web Page Filtering and Re-Authoring for Mobile Users,” published in 1999 by The Computer Journal (Bickmore) further in view of U.S. Patent No. 6,973,619 (Hirose). To establish a *prima facie* case of obviousness under §103 the cited references must teach or suggest all the claim limitations. (MPEP § 2142).

#### **A. Independent Claim 20**

Applicants submit that the combination of Bickmore and Hirose fails to teach or suggest “wherein a folder can be expanded to display information content, and wherein unexpanded folder titles are displayed along with the information content of the expanded folder,” as in claim 20. The Examiner cited to the entire Bickmore article to show this limitation, and then made the broad statement that it would have been an obvious variant of the system taught by Bickmore to include this feature. However, Bickmore does not teach this feature. Rather, in Bickmore, when a link is selected, only the contents of that link are displayed. *See Bickmore, Figure 4.* The remaining unexpanded folder titles are not displayed along with the information content of the expanded folder. Since Hirose does not mention folderizing at all, Hirose also fails to teach this limitation.

Since the combination of Bickmore and Hirose fails to teach or suggest all claim limitations of claim 20, this combination does not render claims 20-22 obvious.

#### **B. Independent Claim 27**

Applicants submit that neither Bickmore nor Hirose, separately or in combination, teach or suggest “removing nodes that do not affect the visual display of the information content on the device and that do not represent the information content to be displayed on the device.”

Bickmore makes no mention of removing nodes when doing document transformation. Similarly, Hirose transforms all information from an HTML document into view objects, and thus, no nodes are removed.

Since the combination of Bickmore and Hirose fails to teach or suggest all claim limitations of claim 27, this combination does not render claims 27-30 obvious.

#### **C. Independent Claim 31**

Claim 31 recites “wherein the plurality of arrays contain values associated with the nodes of the data, and wherein operations on the nodes can be carried out by utilizing the value as referenced to the affected nodes.” Applicants submit that neither Bickmore nor Hirose, separately or in combination, teach or suggest this claim limitation. Bickmore teaches object arrays, whereas claim 31 includes integer based blocks that focus more on optimization for a smaller memory footprint and quicker access, as described at page 31, line 9 to page 34, line 3 in the present specification. Hirose does not overcome the deficiency of Bickmore.

Since the combination of Bickmore and Hirose fails to teach or suggest all claim limitations of claim 31, this combination does not render claims 31-35 and 37-38 obvious.

#### **D. Independent Claim 1**

Applicants amended independent claim 1 to include the limitation from claim 20 which recites “wherein a folder can be expanded to display information content, and wherein unexpanded folder titles are displayed along with the information content of the expanded folder.”

Thus, Applicants submit that independent claim 1 is allowable for at least the reasons that claim 20 is allowable. Because claims 2-15 depend from independent claim 1, Applicants submit that claims 2-15 are also allowable.

#### E. Independent Claim 16

Applicants submit that the combination of Bickmore and Hirose fails to teach or suggest “wherein if a node has no effect on a visual display of the information content and the node is not folder contents, the node is removed,” as in claim 16.

Applicants submit that the Examiner has not shown any teaching within either Bickmore or Hirose that shows “wherein if a node has no effect on a visual display of the information content and the node is not folder contents, the node is removed,” as in claim 16. As discussed above, Bickmore makes no mention of removing nodes when doing document transformation, and similarly, Hirose transforms all information from an HTML document into view objects, and thus, no nodes are removed.

Since the combination of Bickmore and Hirose fails to teach or suggest all claim limitations of claim 16, this combination does not render claims 16-19 obvious.

#### F. Independent Claim 23

Applicants submit that neither Bickmore nor Hirose, separately or in combination, teach or suggest “utilizing normalization markup in the information content to normalize the information content, wherein *the normalization markup provide at least one specific instruction* for normalizing the information content,” as in claim 23 (emphasis added).

Bickmore teaches a document re-authoring method that is an iterative process. A document is iteratively reduced in size, so that at every step in the process, the most promising state of the document, i.e., the state with the smallest current display area requirements, is selected, and a transformation is applied to transform the document from its current state to a more promising state of the document, if possible. As soon as a state is created that contains a

document version that is ‘good enough,’ the process can be halted and that version of the document is returned to the client device for rendering.

In contrast, claim 23 describes a method for normalizing information content in a document wherein at least one specific instruction is provided for normalizing the information content. The normalization markup defines a set of attributes that are triggers for the automatic normalization process to perform certain operations. (Applicants’ Specification, page 45, lines 16-18.)

Bickmore makes no mention of “utilizing normalization markup in the information content to normalize the information content, wherein the normalization markup provide at least one specific instruction for normalizing the information content,” as in claim 23. Similarly, Hirose also does not mention this claim limitation.

Since the combination of Bickmore and Hirose fails to teach or suggest all claim limitations of claim 23, this combination does not render claims 23-26 obvious.

#### **G. Independent Claim 39**

Applicants submit that neither Bickmore nor Hirose, separately or in combination, teach or suggest “applying changes to the document tree according to the template markup language, wherein the template markup language provides at least one specific instruction for normalizing the information content,” as in claim 39, for at least the reasons discussed above for claim 23.

Since the combination of Bickmore and Hirose fails to teach or suggest all claim limitations of claim 39, this combination does not render claims 39-40 obvious.

#### **IV. Conclusion**

Applicants respectfully submit that, in view of the remarks above, all of the pending claims are in condition for allowance. Applicants therefore respectfully request such action.

The Examiner is invited to call the undersigned at (312) 913-3331 with any questions or comments.

Respectfully submitted,

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